

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

EXXONMOBIL OIL CORPORATION,

Petitioner,

v.

TIG INSURANCE COMPANY,

Respondent.

Case No. 16-cv-09527 (ER)

**NOTICE OF MOTION TO VACATE  
CERTAIN ORDERS AND THE FINAL  
JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of TIG Insurance Company's Motion to Vacate Certain Orders and the Final Judgment, Respondent TIG Insurance Company hereby moves the Court and submits this motion requesting that this Court issue an indicative ruling under Federal Rule of Civil Procedure 62.1(a)(3) stating either (i) that it will grant TIG's motion to vacate the order compelling arbitration (Dkt. No. 21), the order confirming the arbitral award and imposing prejudgment interest (Dkt. No. 49), and the final judgment (Dkt. No. 52) in this matter if the Second Circuit remands for that purpose; or (ii) that the motion at least raises a substantial issue regarding the justification for vacatur, as well as any other relief the Court deems necessary.

Dated: August 13, 2021

/s/ Daniel P. Goldberg

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